

In the preamble of the ISPS Code it states, "Contracting Governments, when approving ship and port facility security plans, should pay due cognizance to the fact that ship's personnel live and work aboard the vessel and need access to shore-based seafarers welfare facilities, including medical care." In Part A of the Code it further provides "procedures for facilitating shore leave for ship's personnel or personnel changes, as well as access of visitors to the ship including representatives of seafarers welfare organizations and labor organizations". In Conference Resolution #11 - Human Element Related Aspects & Shore Leave for Seafarers, it states "considering that, given the global nature of the shipping industry, seafarers deserve adequate protection under all circumstances, being aware that seafarers work and live on ships involved in international trade and that access to shore facilities and shore leave are vital elements of seafarers well-being and, therefore, to the realization of safer and cleaner oceans, being aware also that the ability to go ashore is essential for joining and leaving a ship after the agreed period of service, urges Contracting Governments to take the human element in to consideration. We fully support this language, recently approved by the International Maritime Organization (IMO) in regard to maritime security.

It is important to keep in mind that US Mariners, in addition to being the best trained, are the most extensively regulated and documented in the world. The government should focus more of the maritime security concerns on foreign flag operators, those nations who have a record of non-compliance, and especially the ships that fly flags of convenience. The US mariners should not be taxed with a burdensome amount of new regulations and security procedures. Any and all additional user fees resulting from the new clearance/documentation process that will be required should be waived for mariners already possessing documents.

Crewmembers often have very short periods of port time; it is critical that they be allowed access to/from the ship and port facilities in an expeditious manner. It is clear that the waterfront, facilities and ships, must be kept safe and secure. The worker's and company's interests must be equally addressed and security plans tailored to meet the needs of our industry. However, we must ensure that the human rights and civil rights of all maritime workers, including the right to organize and actively participate in union activities, are respected during this rule making process. The government should act carefully so as not to arbitrarily impose regulations on maritime workers that fail to take into account the unique nature of seafaring life.